

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 2004-CR-10194RCL

UNITED STATES

V.

ANTHONY BUCCI

MOTION TO AMEND ORDER OF RELEASE

Now comes Anthony Bucci, in the above-numbered indictment, and requests that the Court consider amending its Order of Release from requiring a bond in the amount of \$300,000 on the property at 500 Salem Street, Apartment # 607, Medford, Massachusetts and \$25,000 for 6 Maple Road, North Reading, Massachusetts to \$250,000 for 500 Salem Street, Apartment # 607, Medford, Massachusetts and \$100,000 for 6 Maple Road, North Reading, Massachusetts.

In support thereof, it appears that the Medford property was appraised at \$295,000 rather than \$300,000, plus there is a mortgage (equity line) on the property for \$30,000.00. However, according to attachment A, the amount owed is \$14,283.71. therefore, to error on the side of caution it is requested that the bond be set in the amount of \$250,000 on this property.

A review of the property at 6 Maple Road, North Reading, Massachusetts has an appraised value of \$580,000. It is reasonable to infer that the mortgage of \$198,000 from Ameriquest Mortgage Company was discharged when World Savings Bank recorded a mortgage of \$375,000.00 (it is doubtful, if at time of this mortgage, the property could have carried both mortgages). Therefore, also adding in another \$25,000 from World Savings Bank (this clearly shows the first mortgage was discharged), this property has equity of \$180,000 and as act of good faith, Mr.

Bucci will place a bond on this property for \$100,000, thereby securing his appearance by a bond in the amount of \$350,000.

Respectfully submitted,
FOR THE DEFENDANT,



Barry P. Wilson
LAW OFFICES OF BARRY P. WILSON
240 Commercial Street
Suite 5-A
Boston, MA 02109
617) 248-8979
(617) 523- 8700 (Fax)
BBO# 529680

Dated: 8/19/04

Attachment A



419 Broadway
Everett, MA 02148
Phone: (617) 387-1110
Fax: (617) 381-0924

July 20, 2004

To Whom It May Concern:

This is to inform you that,

Name: George B. Keefe
Rosemarie K. Keefe
Address: 500 Salem Street, Unit 607
Medford, MA 02155-3382

Has established the following accounts at the Everett Co-operative Bank:

Type of Account	Account Number	Date Opened	Current Balance
Home Equity Line of Credit	690027917314	04-08-1998	14,283.71

This customer receives a monthly direct deposit from _____
for \$ _____.

If you have any questions, please feel free to contact Customer Service at (617) 387-1110.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia Pratt".

Patricia Pratt
Customer Service Representative

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF)	
AMERICA,)	
)	CRIMINAL ACTION NO.
VS.)	No. 2004-CR-10194RCL
)	
ANTHONY BUCCI)	
Defendant.)	

CERTIFICATE OF SERVICE

I, Barry P. Wilson, do hereby certify that by hand delivery and fax I did serve one (1) copy of the within "Motion to Amend Order of Release," on Thursday, August 19, 2004, to John Farley, A.U.S.A., United States District Court, 1 Courthouse Way, Suite 9200, Boston, MA 02210

Date:

August 19, 2004

Barry P. Wilson
Barry P. Wilson

BARRY P. WILSON, ESQ.
240 Commercial Street
Suite 5A
Boston, MA 02109

(617) 248-8979
FAX NO. 617/523-8700

FACSIMILE TRANSMITTAL FORM

TO: Honorable Judge Alexander FAX NO.: 617 748 4584
U.S. Courthouse DATE: 8/15/04
Boston MA 02110

RE: USA v. Bucca

COMMENTS: Enclosed please find Motion to
Amend Order of Release that of will
file today.
Jerry Miller

**IF YOU EXPERIENCE DIFFICULTY RECEIVING THIS TRANSMISSION,
PLEASE CALL 617/248-8979.**

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